

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	
		CASE NO. 2:20-CR-62(1)
vs.	:	JUDGE MORRISON
STEVEN G. ROSSER,	:	
Defendant.	:	

**MOTION TO TEMPORARILY
MODIFY CONDITIONS OF RELEASE**

Defendant Steven G. Rosser, through undersigned counsel, hereby moves this Court for an Order temporarily modifying his conditions of release.

Respectfully submitted,

/s/ Steven S. Nolder

Steven S. Nolder (0037795)
65 East State Street, Suite 200
Columbus, Ohio 43215
(614) 221-9790
snolder9@gmail.com
Attorney for Steven G. Rosser

MEMORANDUM

On March 31, 2021, Steven G. Rosser was released on pretrial supervision and his travel was restricted to the Southern District of Ohio. (R. #11, Order Setting Conditions of Release). On eight occasions, Rosser's conditions of release were temporarily modified allowing him to travel outside the Southern District of Ohio. (R. #31, 37, 40, 44, 59, 101, 106, and 109). On all occasions, Rosser assiduously complied with this court's orders and returned as scheduled.

On October 6, 2022, Rosser was sentenced to serve 18 months in prison, and he's been designated to report to FCI Estill to discharge this sentence. Rosser's original self-surrender date was postponed permitting he and his wife the opportunity to gain custody of their grandchildren. (R. #117, Motion to Postpone Self-Surrender) (R. #122, Order). Rosser is still designated to report to FCI Estill, but his report date is now December 8, 2022.

Steve and Deana Rosser have no children together, but she has a son, Blake, who Steve has reared since he was five years old. (PSR, ¶52). Blake is now 17 years old and suffers from a myriad of serious health issues including cystic fibrosis, liver disease, and diabetes. (PSR, ¶52). Blake's football idol is Tom Brady and his team, the Tampa Bay Buccaneers, plays the Cleveland Browns in Cleveland at 1:00 p.m. on November 27, 2022. As a surprise for Blake, his mother secured two tickets to the game and, if permitted, Steve would like to take his son to this game before he reports to serve his sentence. If permitted, Rosser and Blake would travel to the Northern District of Ohio on November 27th and would return to the Southern District of Ohio after the game concludes.

Undersigned counsel has discussed this matter with AUSA Kevin Kelley who doesn't oppose this temporary modification.

In conclusion, Steven G. Rosser, through undersigned counsel, hereby moves this Court for an Order temporarily modifying his conditions of release to enable him to travel to the Northern District of Ohio on November 27th and return to the Southern District of Ohio later that evening.

Respectfully submitted,

/s/ Steven S. Nolder
Steven S. Nolder (0037795)
65 East State Street, Suite 200
Columbus, Ohio 43215
(614) 221-9790
snolder9@gmail.com
Attorney for Steven G. Rosser

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document has been electronically served on AUSAs Kevin Kelley and Noah Litton this 8th day of November, 2022.

/s/ Steven S. Nolder
Steven S. Nolder (0037795)
Attorney for Steven G. Rosser